

WEIL, GOTSHAL & MANGES LLP

Richard W. Slack (*pro hac vice*)

(richard.slack@weil.com)

Jessica Liou (*pro hac vice*)

(jessica.liou@weil.com)

Matthew Goren (*pro hac vice*)

(matthew.goren@weil.com)

767 Fifth Avenue

New York, NY 10153-0119

Tel: (212) 310-8000

Fax: (212) 310-8007

KELLER BENVENUTTI KIM LLP

Jane Kim (#298192)

(jkim@kbbkllp.com)

David A. Taylor (#247433)

(dtaylor@kbbkllp.com)

Thomas B. Rupp (#278041)

(trupp@kbbkllp.com)

425 Market Street, 26th Floor

San Francisco, CA 94105

Tel: (415) 496-6723

Fax: (650) 636-9251

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF ANGELA FERRANTE
IN SUPPORT OF REORGANIZED
DEBTORS' THIRTY-EIGHTH SECURITIES
CLAIMS OMNIBUS OBJECTION TO
CLAIMS FILED BY ISS (INSUFFICIENT
SUBSTANTIVE ALLEGATIONS AND ADR
NO LIABILITY CLAIMS)**

Date: April 9, 2024

Time: 4:00 p.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, Angela Ferrante, hereby declare that the following is true and correct to the best of my
2 knowledge, information, and belief:

3 1. I am a Managing Director of Kroll Settlement Administration LLC, an affiliate of Kroll
4 Restructuring Administration LLC (formerly known as Prime Clerk) (collectively for purposes of this
5 Declaration, “**Kroll**”). In my current role as Managing Director, I am responsible for all business
6 operations including but not limited to securities claims noticing and administration.

7 2. I am providing this Declaration in support of the *Reorganized Debtors’ Thirty-Eighth*
8 *Securities Claims Omnibus Objection To Claims Filed By ISS (Insufficient Substantive Allegations and*
9 *ADR No Liability Claims)* (the “**Objection**”),¹ filed contemporaneously herewith in the chapter 11 cases
10 (the “**Chapter 11 Cases**”) of PG&E Corporation and Pacific Gas and Electric Company, as debtors and
11 reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**,” as applicable).

12 3. Kroll has been asked by the Reorganized Debtors and their counsel to assist with
13 reviewing and analyzing the claims based on the purchase or acquisition of PG&E securities filed in the
14 Chapter 11 cases. I have over 20 years of experience in class action, legal, and administrative fields. I
15 have personally overseen the administration of some of the most complex class action, regulatory and
16 bankruptcy administrations in the country.

17 4. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon
18 my personal knowledge, the knowledge of other employees working under and alongside me on this
19 matter, my discussions with the Reorganized Debtors’ personnel and the Reorganized Debtors’ various
20 advisors and counsel, and my review of relevant documents and information. If called upon to testify, I
21 would testify competently to the facts set forth in this Declaration. I am authorized to submit this
22 Declaration on behalf of the Reorganized Debtors.

23 5. Kroll has been asked by the Reorganized Debtors and their counsel to assist with
24 reviewing and analyzing the claims based on the purchase or acquisition of PG&E securities filed in the

25 _____
26 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the
27 Objection.
28

1 Chapter 11 Cases and identifying claims to be included in omnibus objections, including the Objection.
2 In furtherance thereof, our team has reviewed and established a database for these claims and has
3 communicated with claimants, including ISS.

4 6. On May 12, 2021, Kroll mailed Trading Information Request Forms (“TIRFs”) to ISS
5 pursuant to the Securities Claims Information Procedures. Kroll received responses from ISS by emails
6 dated May 13, 2021 and May 14, 2021. On May 20, 2021, Kroll accepted trading data submitted by
7 ISS.

8 7. On or about May 25, 2021, Kroll became aware that ISS had sent a letter to its clients
9 attempting to remove themselves from their filed claims. At or around this time, and in the following
10 months, we began receiving amending claims and/or questions from certain of the underlying clients
11 whose transaction data was included in the ISS Claims.

12 8. Since then, Kroll has received a handful of communications from ISS, including to
13 confirm certain transaction data submitted in connection with the ISS Claims.

14
15
16
17
18 *[Remainder of Page Left Blank Intentionally]*
19
20
21
22
23
24
25
26
27
28

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
2 correct to the best of my knowledge, information, and belief.

3
4 Executed December 13, 2023 in New York, New York.

5
6 /s/ Angela Ferrante

7 Angela Ferrante
8 Managing Director
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28